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February 16, 2021

VIA FedEx Overnight Mail

Honorable Paul G. Gardephe
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *United States v. Green*, S5 16 Cr. 281-2 (PGG)

Dear Judge Gardephe:

We write in connection with the correspondence filed by Mr. Green regarding requests for information from our files. Specifically, we write to update the Court on what we have sent to Mr. Green. Upon our removal from the case, we sent a flash drive to Ms. Dolan containing, among other things, the 3500 materials, discovery, transcripts from the trial and the pre-trial suppression hearing. Ms. Dolan never advised that she could not access the documents. Upon Mr. Witzel's appointment, we again forwarded the 3500 material, government exhibits, and transcripts, as well as transcripts from the pre-trial suppression hearing.

Following that, Mr. Green wrote to the Court requesting correspondence between us and the government. We have collected that correspondence and are in the process of reviewing it. Once it has been reviewed, we will provide copies to Mr. Green and to Mr. Witzel. Any documents covered by the Court's protective order will be sent only to Mr. Witzel, unless the Court orders otherwise.

As for the additional information requested in Mr. Green's January 31, 2021 letter, the Sisco 3500, trial testimony, and stipulations were all provided to Mr. Witzel upon his appointment. The remaining information requested by Mr. Green will be captured in our current review. We believe that this covers Mr. Green's various requests.

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If the Court has any questions or desires additional action on our part, please do not hesitate to let us.

Respectfully submitted,

/s/ Eric R. Breslin
Eric R. Breslin

cc: All counsel of record via E-Mail.